

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

COLE SCHOTZ P.C.

Michael D. Sirota, Esq. (NJ Bar No. 014321986)
Warren A. Usatine, Esq. (NJ Bar No. 025881995)
Court Plaza North, 25 Main Street
Hackensack, New Jersey 07601
(201) 489-3000
msirota@coleschotz.com
wusatine@coleschotz.com

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)
Christine A. Okike, P.C. (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
(212) 446-4800
jsussberg@kirkland.com
christine.okike@kirkland.com

HAYNES AND BOONE, LLP

Richard S. Kanowitz, Esq. (NJ Bar No. 047911992)
Matthew T. Ferris, Esq. (admitted *pro hac vice*)
30 Rockefeller Plaza, 26th Floor
New York, New York 10112
(212) 659-7300
richard.kanowitz@haynesboone.com
matt.ferris@haynesboone.com

Attorneys for Debtors and Debtors in Possession

In re:

BLOCKFI INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered)

**ORDER SHORTENING TIME FOR NOTICE OF DEBTORS'
MOTIONS FOR ENTRY OF ORDERS (I) APPROVING THE
DEBTORS' SETTLEMENT AGREEMENT WITH DIGISTAR
NORWAY AS, NESSIM-SARIEL GAON, AND FIORENZO
MANGANIELLO AND (II) AUTHORIZING THE DEBTORS TO
FILE UNDER SEAL EXHIBIT A TO THE SETTLEMENT AGREEMENT**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

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Debtors: BLOCKFI INC., *et al.*

Case No.: 22-19361(MBK)

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MANGANIELLO AND (II) AUTHORIZING THE DEBTORS TO FILE
UNDER SEAL EXHIBIT A TO THE SETTLEMENT AGREEMENT

The relief set forth on the following pages numbered three (3) through four (4) is

ORDERED.

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Debtors: BLOCKFI INC., *et al.*

Case No.: 22-19361(MBK)

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Upon review of the *Application for Order Shortening Time for Notice of Debtors' Motions for Entry of Orders (I) Approving the Debtors' Settlement Agreement with Digistar Norway AS, Nessim-Sariel Gaon, and Fiorenzo Manganiello and (II) Authorizing the Debtors to File Under Seal Exhibit A to the Settlement Agreement* (the "Application")¹ of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") requesting that the time period for the Motion to Quash be shortened pursuant to FED. R. BANKR. P. 9006(c)(1) and a hearing scheduled on October 10, 2023,

IT IS HEREBY ORDERED THAT:

1. A hearing will be conducted on the Assignment Motion and the Sealing Motion on _____, October __, 2023 at ____ prevailing Eastern Time before the Honorable Chief Judge Michael B. Kaplan, Clarkson S. Fisher United States Courthouse, 402 East State Street, Second Floor, Courtroom 8, Trenton, NJ 08608.

2. The Debtors must serve a copy of this Order, and all related documents, to all parties in interest by either overnight mail or email, as applicable.

3. Service must be made on the same day as the date of this Order.

4. Notice by telephone is not required.

5. Any objections to the Assignment Motion must be filed by _____, October __, 2023 at _____ prevailing Eastern Time.

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

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6. Parties may request to appear by phone by contacting Chambers prior to the return date.